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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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THE BANK OF NEW YORK MELLON FKA )  
THE BANK OF NEW YORK, AS TRUSTEE )  
FOR THE CERTIFICATEHOLDERS OF )  
CWALT, INC., ALTERNATIVE LOAN )  
TRUST 2007-AL1, MORTGAGE PASS- )  
THROUGH CERTIFICATES SERIES 2007- )  
AL1, a New York corporation, )

Case No. 3:17-cv-00115-LRH-VPC

Plaintiff, )

vs. )

HIGHLAND RANCH HOMEOWNERS )  
ASSOCIATION, a Nevada corporation; )  
AIRMOTIVE INVESTMENTS, LLC, a Nevada )  
limited liability company; LETICIA RANGEL )  
DE LOPEZ, an individual; LUIS LOPEZ- )  
LANDEROS, an individual; DOES 1 through )  
10, inclusive, and ROES 1 through 10, )  
inclusive, )

Defendants. )

**STIPULATION AND ORDER TO EXTEND TIME TO**  
**RESPOND TO MOTION FOR SUMMARY JUDGMENT**  
**(First Request)**

COMES NOW Plaintiff, THE BANK OF NEW YORK MELLON FKA THE BANK OF

1 NEW YORK, AS TRUSTEE FOR THE CERTIFICATEHOLDERS OF CWALT, INC.,  
2 ALTERNATIVE LOAN TRUST 2007-AL1, MORTGAGE PASS-THROUGH CERTIFICATES  
3 SERIES 2007-AL1, and Defendant, AIRMOTIVE INVESTMENTS, LLC, by and through their  
4 undersigned counsel, and hereby stipulate and agree as follows:

- 5 1. On April 25, 2018, Plaintiff filed a Motion for Summary Judgment herein [ECF  
6 #34]. A Response was due on May 16, 2018.
- 7 2. No hearing has been scheduled and to the best of the knowledge of counsel, the  
8 Court has not yet otherwise taken any action related to the subject Motion to date.
- 9 3. Defendant's counsel's office recently underwent staffing changes which resulted  
10 in a unintentional failure to properly calendar the due date for the response to the  
11 subject Motion. Defendant's counsel respectfully submits that such failure  
12 constitutes excusable error.
- 13 4. Moreover, Defendant's counsel has been required to devote time and attention to  
14 numerous other pending legal matters since the filing of the Motion for Summary  
15 Judgment which detracted from the time available prepare a response.
- 16 5. Based upon the foregoing, Defendant has requested and shall be granted an  
17 extension of time until June 15, 2018, in which to respond to the Plaintiff's  
18 Motion for Summary Judgment.

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1           6.       Plaintiff shall have an extended period of time until July 9, 2018, in which to file  
2                   any Reply.

3           7.       This Stipulation is made in good faith and not for purpose of delay.

4           Dated this 1<sup>st</sup> day of June, 2018.

5       ROGER P. CROTEAU &  
6       ASSOCIATES, LTD.


AKERMAN LLP

7       /s/ Timothy E. Rhoda  
8       TIMOTHY E. RHODA, ESQ.  
9       Nevada Bar No. 7878  
10      9120 West Post Road, Suite 100  
11      Las Vegas, Nevada 89148  
12      (702) 254-7775  
13      [croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
14      Attorney for Defendant  
15      Airmotive Investments, LLC

16      /s/ William S. Haldas  
17      WILLIAM S. HABDAS, ESQ.  
18      Nevada Bar No. 13138  
19      1635 Village Center Circle, Suite 200  
20      Las Vegas, NV 89134  
21      (702) 634-5000  
22      [william.haldas@akerman.com](mailto:william.haldas@akerman.com)  
23      Attorney for Plaintiff  
24      Bank of New York Mellon

25                   IT IS SO ORDERED , nunc pro tunc.

26                   DATED this 4th day of June, 2018.

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28                   LARRY R. HICKS  
                    UNITED STATES DISTRICT JUDGE